

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DANIEL SHANAHAN, *individually and on
behalf of those similarly situated,*

and

LEVORA ADDISON, *individually and on
behalf of those similarly situated,*

Plaintiffs,

v.

KEYBANK,

Defendant.

) Case No. 1:19-cv-2477
)
) Judge Pamela A. Barker
)

) **JOINT MOTION TO EXTEND STAY**
) **OF PROCEEDINGS**
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Plaintiffs Daniel Shanahan and LeVora Addison (“Plaintiffs”) and Defendant KeyBank National Association, (“Defendant”), respectfully move this Court to extend the current stay of all proceedings through April 30, 2020, including the current briefing deadlines in place with respect to Defendant’s Motion to Compel Arbitration and Dismiss Plaintiff’s First Amended Complaint. (Doc. #: 16). This motion is not for purposes of delay. The parties are in the process of scheduling mediation for March or April, 2020, and wish to conserve resources while they explore whether this matter can be resolved without further litigation. Extending the current stay will not prejudice the parties.

Respectfully submitted,

/s/ Justin Swidler (email consent)

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CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2019 a copy of the foregoing *Joint Motion to Stay Proceedings* was electronically filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Corey N. Thrush
One of the Attorneys for Defendant

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